



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

July 24, 2018

David Chi  
Regulatory Affairs Manager  
Monsanto Company  
800 North Lindbergh Blvd  
St. Louis, Missouri 63167

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 to:

- Make minor changes to the caution statement
- Make minor changes to Directions for Use
- Replace "524-XXX" with "524-645"

Product Name: MON 88702  
EPA Registration Number: 524-645  
Application Date: 3/26/2018  
OPP Decision Number: 542195

Dear Mr. Chi:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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If you have any questions, please contact Matt Weiner of my team by phone at 703-347-0333 or via email at [weiner.matthew@epa.gov](mailto:weiner.matthew@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Alan Reynolds', with a long horizontal flourish extending to the right.

Alan Reynolds, Team Leader  
Emerging Technologies Branch  
Biopesticides and Pollution  
Prevention Division (7511P)  
Office of Pesticide Programs

Enclosure

**Plant-Incorporated Protectant Label**

**MON 88702**

**Insect-Protected Cotton**  
(OECD Unique Identifier : MON-88702-4)

**Active Ingredients:**

Cry51Aa2.834\_16 protein and the genetic material necessary for its production (vector PV-GHIR508523) in event MON 88702 cotton (Unique Identifier MON-88702-4)  
..... ≤0.17%\*

\* Percentage protein on a dry weight basis as expressed in cotton plant cells (leaf tissue)

KEEP OUT OF REACH OF CHILDREN

**CAUTION**

~~NET CONTENTS~~ \_\_\_\_\_

**EPA Registration No. ~~524-XXX~~ 524-645**

**EPA Establishment No. 524-MO-002**

Monsanto Company  
800 North Lindbergh Blvd.  
St Louis, MO 63167

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**NOTIFICATION**

524-645

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

07/24/2018

## DIRECTIONS FOR USE

It is a violation of Federal law to use this ~~seed~~ product in any manner inconsistent with ~~this its~~ labeling. This product must be used as specified in the terms and conditions of the registration.

MON 88702 expresses the Cry51Aa2.834\_16 protein, which provides protection against feeding damage from the following hemipteran and thysanopteran cotton pests:

Tarnished Plant Bug	<i>Lygus lineolaris</i>
Western Tarnished Plant Bug	<i>Lygus hesperus</i>
Cotton Fleahopper	<i>Pseudatomoscelis seriatus</i>
Thrips	<i>Frankliniella</i> spp.

Planting seed containing MON 88702 may only be planted for the purposes of agronomic evaluation, seed increase and production in breeding nurseries as specified in the terms and conditions of this registration and on the labeling. Commercial plantings of this product for the purposes of grain production and controlling insect pests are prohibited.

Plants that contain the pesticide product may be grown on a total of 40,000 acres or less per year in the U.S., with a limit of 2,000 acres per county, and the territory of Puerto Rico, subject to the restrictions below.

The following information regarding test plots and seed production must be displayed on bags/bag tags of MON 88702 cotton seed intended for these purposes:

- a) Experimental plots and breeding nurseries of MON 88702 cotton are prohibited on the U.S. Virgin Islands, and Hawaii.
- b) Test plots or breeding nurseries, regardless of plot size, established on the island of Puerto Rico may be established without restriction if insecticide applications are used to effectively mitigate gene flow. Otherwise, established test plots or breeding nurseries, regardless of plot size, established on the island of Puerto Rico must not be planted within three miles of feral cotton and must be surrounded by 24 border rows of a suitable pollinator trap crop.
- c) Harvested seed are not allowed for sale as commercial seed in the U.S. under the current conditions of this registration, but any seed containing MON 88702 may be handled in accordance with legal and regulatory requirements (*e.g.*, non-treated seed can be sold as grain).

There are no refuge requirements for planting of MON 88702.